

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:18-MJ-543

MANUEL MERCADO (01)

CRIMINAL COMPLAINT

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before April 2018, and continuing until on or about September 5, 2018, in the Northern District of Texas, and elsewhere, defendant, **Manuel MERCADO**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

1. In approximately October 2017, investigators from the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Texas Department of Public Safety (TDPS), and Tarrant County Combined Narcotics Enforcement Team (CNET), began an investigation into the drug trafficking activities of Robert Shane Burris, Brandi Lee Gibbs, Seth Jacob Tyler Vargas, and others in the Fort Worth, Texas area. Burris, Gibbs, Vargas, and others, have since been arrested and pled guilty to drug charges in the Fort Worth Division of the Northern District of Texas.

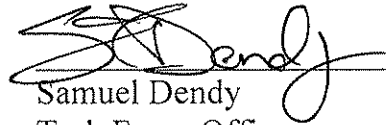
The subsequent investigation has revealed that MANUEL MERCARDO was an alternative methamphetamine source-of-supply to others involved in the drug trafficking activities of Burris and Gibbs.

2. As a result of that investigation, on September 5, 2018, Texas Department of Public Safety (TDPS) and Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Agents executed a State narcotics search warrant of residence XXX Embrey Drive Dallas, Texas belonging to Manuel MERCADO. During the search of the residence, Agents located over five (5) kilograms of methamphetamine in a bedroom. During a post- Miranda interview, MERCADO admitted that there was one (1) pound of methamphetamine inside the residence (MERCADO did not mention the additional five kilograms found near the separate one pound of methamphetamine MERCADO admitted to). In addition, MERCADO admitted to distributing methamphetamine for a profit.

3. Because this affidavit is submitted for the limited purpose of securing a criminal complaint, I have not included details of every aspect of the investigation. Instead, I have only listed those facts I believe necessary to establish probable cause to believe that the defendants committed the above-identified crimes.

4. Based on the foregoing, the Complainant believes that probable cause exists that defendant **MANUEL MERCADO**, along with others both known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B),

namely to distribute and to possess with intent to distribute more than 50 grams of methamphetamine, in violation of 21 U.S.C. § 846.

A handwritten signature in black ink, appearing to read "S. Dendy", written over a horizontal line.

Samuel Dendy
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms
and Explosives

SWORN AND SUBSCRIBED before me, at 1:59 p.m., this 6 day of September 2018.

A handwritten signature in black ink, appearing to read "Jeffrey L. Cureton", written over a horizontal line.

JEFFREY L. CURETON
United States Magistrate Judge